

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER MANHART, *individually and on
behalf of all others similarly situated,*
Plaintiff,

v.

NATIONAL STUDENTS FOR JUSTICE IN
PALESTINE, A PROJECT OF WESPAC
FOUNDATION, INC.; WESPAC FOUNDATION,
INC.; DISSENTERS; JEWISH VOICE FOR PEACE;
TIDES CENTER, D/B/A COMMUNITY JUSTICE
EXCHANGE; JINAN CHEHADE; SUPERIOR
MURPHY; RIFQA FALANEH; AND SIMONE
TUCKER,

Defendants.

No. 1:24-cv-8209

District Judge Mary L. Rowland

Magistrate Judge Keri L. Holleb
Hotaling

**DEFENDANT TIDES CENTER, D/B/A COMMUNITY JUSTICE EXCHANGE’S
MOTION TO DISMISS PURSUANT TO RULE 12
OF THE FEDERAL RULES OF CIVIL PROCEDURE**

For all the reasons provided in the accompanying memorandum of law, Defendant Tides Center d/b/a Community Justice Exchange (“CJE”), by and through its attorneys, and pursuant to Rule 12 of the Federal Rules of Civil Procedure, hereby respectfully moves this Court to dismiss Plaintiff Christopher Manhart’s Second Amended Verified Complaint, ECF 69, with prejudice. In support of this motion, CJE submits the accompanying memorandum of law, and states as follows:

1. On January 29, 2025, Plaintiff filed the Second Amended Verified Complaint (ECF 69) (the “SAC”).

2. For the reasons stated in the accompanying memorandum of law, the SAC is barred by well-established law and should be dismissed with prejudice.

WHEREFORE for all the reasons stated in this motion and accompanying memorandum

of law in support, Defendant CJE respectfully requests that this Court enter an order dismissing the SAC with prejudice and ordering any other relief that the Court deems proper.

Dated: February 25, 2025

Respectfully submitted,

/s/ Precious S. Jacobs-Perry

Precious S. Jacobs-Perry (ARDC No. 6300096)

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